DuPont Automotive
400 Groesbeck Highway
Mount Clemens, MI 48043

RECEIVED
OPPT CBIC

8EHQ-0995-13511

95 SEP 19 PM 12:17

DuPont Automotive

Certified Mail
Return Receipt Requested

RECEIVED
OPPT NCIC
95 SEP 22 AM 9:20

ORIGINAL

September 13, 1995

Document Processing Center (TS-790)
Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
Environmental Protection Agency
401 M Street SW
Washington, DC 20460

Contains No CBI

Dear Sir / Madam:

This letter serves to notify the U.S. Environmental Protection Agency (EPA) that trace quantities of Polychlorinated Biphenyls (PCB) have been detected in storm drainage swales, storm sewers, sanitary sewers and on concrete floors at Du Pont's Automotive Finishes Facility in Mt. Clemens, Michigan. Additionally, trace quantities of Polychlorinated Dibenzofurans (PCDF) and Polychlorinated Dibenzo-p-Dioxins (PCDD) have been found in a storm sewer and on concrete floors at the same facility. EPA Region V has been contacted regarding these findings, and specific data on these trace levels is being provided to the Region as requested.

We believe that the levels of PCB, PCDD and PCDF detected do not constitute a substantial risk to the environment. The protective measures we have implemented preclude health risks to workers. However, given EPA's guidance on the reportability of such information under TSCA section 8(e), we are forwarding this data for informational purposes.

The facility was purchased by Du Pont in 1986 from Ford Motor Company. PCB containing heat transfer oils were not used since 1973, although concentrations of >50 ppm were measured after oil changeouts in 1973, due to trace amounts left in the system during changeout. In the time frame of 1986 to 1995, PCB's

have been intermittently detected in the sanitary sewer from self-monitoring in compliance with a permit to operate issued by Mt. Clemens POTW. In 1990, a joint Du Pont and Ford study found PCB's in storm drainage swales. Ford, as mandated by the State of Michigan, remediated the swales to < 1 ppm of PCB.

Du Pont initiated a study to identify the source of PCB's in the sanitary sewers and to recommend remediation steps to eliminate PCB discharges in the storm and sanitary sewers. PCB, along with PCDF and PCDD contamination was identified in the above-mentioned areas. Further investigation will be initiated.

The source of the PCB is from the handling and use of PCB-containing heat transfer oils. It is suspected that the PCDD and PCDF are from a fire of the PCB contaminated oil which occurred in 1979. The drainage of contaminated extinguishing agents during and following the firefighting activities spread the PCB, PCDD and PCDF to the areas previously described.

Robert B Bronsky

R. B. Bronsky
Technical, Safety, Health
& Environmental Sup't.

CC: R. Austin
A. Malinowski
J. Randall
P. Hurd
D. Trabbic-Pointer
G. Patterson